

UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE



Jonathan Leite,
Plaintiff

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v.

Civil No. 15-cv-00280-PB

Matthew Goulet *et al.*,
Defendants

AFFIDAVIT OF YAIR BALDERRAMA

I, Yair Balderrama, upon oath do hereby depose and state as follows:

1. I have worked for the New Hampshire Department of Corrections for the past 20 years and have worked at the Northern New Hampshire Correctional Facility ("NCF") from 2003 to present. I make this affidavit based on my personal knowledge.

2. My job responsibilities at NCF on August 24, 2012 did not involve conducting rounds or counts on F-block. I did not participate in any rounds or counts on F-block on August 24, 2012.

3. Rather, I was assigned to the Central Control room where I was responsible for numerous duties involving the general operation of the entire facility. As I stated in my deposition at pages 7 through 13, the operation of Central Control is demanding and multi-faceted. Although the Central Control room has viewing access to all of the facility's cameras, monitoring the inmates' activities on their housing units is not a primary responsibility of the two officers working in Central Control.

4. At no point on August 24, 2012 did I view any video footage of the F-block housing unit that caused me any concern for the safety of the inmates within that unit.

5. At no point on or prior to August 24, 2012 was I informed by an inmate Leite or any other individual that inmate Liette or any other individual was at risk of an assault or any other harm.

6. I also did not work in the NCF visiting room on August 24, 2012, and, therefore, I did not participate in post-visit searches of inmates on that date.

7. I declare under the penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Date: October 10, 2017

s/ Yair Balderrama
Yair Balderrama